

BAKER BOTTS L.L.P.

John M. Taladay (*pro hac vice*)

Evan J. Werbel (*pro hac vice*)

Thomas E. Carter (*pro hac vice*)

Andrew L. Lucarelli (*pro hac vice*)

700 K Street, N.W.

Washington, D.C. 20001

(202)-639-7700

(202)-639-7890 (fax)

Email: john.taladay@bakerbotts.com

evan.werbel@bakerbotts.com

tom.carter@bakerbotts.com

drew.lucarelli@bakerbotts.com

Attorneys for Defendants

Irigo Group Corp. and

Irigo Display Devices Co., Ltd.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION,

) Case No. 07-cv-05944-JST

) MDL No.: 1917

THIS DOCUMENT RELATES TO:

ALL INDIRECT PURCHASER
ACTIONS

) **DECLARATION OF THOMAS**
) **CARTER IN SUPPORT OF IRIGO**
) **DEFENDANTS' ADMINISTRATIVE**
) **MOTION TO CONSIDER WHETHER**
) **LG ELECTRONICS INC. MATERIAL**
) **SHOULD BE SEALED PURSUANT TO**
) **CIVIL LOCAL RULES 7-11 AND 79-**
) **5(f)**

I, Thomas Carter, declare as follows:

1. I am an attorney admitted to practice law in Washington, D.C. and am employed by the law firm of Baker Botts L.L.P., which represents Defendants Irico Group Corporation (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display”) (collectively, “Irico Defendants”). I make this Declaration based on my personal knowledge and in support of the Irico Defendants’ Administrative Motion to Consider Whether LG Electronics Inc. Material Should Be Sealed Pursuant to Civil Local Rules 7-11 and 79-5(f).

2. Attached hereto as Exhibit 1 is a true and correct copy of the Apr. 15, 2014 Expert Report of Janet S. Netz.

3. Attached hereto as Exhibit 12 is a true and correct copy of the Mar. 16, 2022 Supplemental Expert Report of Margaret Guerin-Calvert.

4. Attached hereto as Exhibit 34 is a true and correct copy of the Oct. 1, 2012 Declaration of Janet S. Netz in Support of Indirect Purchaser Plaintiff Motion for Class Certification.

5. Attached hereto as Exhibit 36 is a true and correct copy of the Feb. 15, 2013 Class Certification Rebuttal Declaration of Janet S. Netz.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of February, 2023, in Potomac, Maryland.

/s/ Thomas Carter

Thomas Carter
tom.carter@bakerbotts.com
BAKER BOTTS LLP
700 K St. NW
Washington, D.C. 20001
Telephone: (202) 693-7702
Mobile: (202) 412-4352

*Attorneys for Defendants
Irico Group Corp. and
Irico Display Devices Co., Ltd.*